

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AON PLC, a United Kingdom public limited company, and AON GROUP, INC., a Maryland corporation,

Plaintiffs,

v.

MICHAEL HEFFERNAN, an individual, and ALLIANT INSURANCE SERVICES, INC., a Delaware corporation,

Defendants.

Case No. 16 CV 1924

(Jury Demanded)

**AON'S MOTION FOR LEAVE
TO FILE UNDER SEAL**

Plaintiffs Aon plc and Aon Group, Inc. ("Aon"), by their attorneys DLA Piper LLP (US), respectfully move this Court under Local Rule 26.2 for leave to file Aon's Memorandum in Support of Aon's Emergency Motion for Order to Show Cause and six exhibits to the Memorandum under seal, and in support, state as follows:

1. At the hearing on February 4-5, 2016, the Court directed that a portion of the transcript identifying one of Aon's former clients be kept confidential.
2. On February 19, 2016, Aon filed the following documents containing the names of certain former clients, including but not limited to the former client identified in the transcript of the February 4 hearing:
 - a. Memorandum in Support of Aon's Emergency Motion for Order to Show Cause;
 - b. Declaration of Shand S. Stephens;
 - c. Declaration of Michael Rask;

- d. Declaration of Matt Anacker;
- e. Declaration of John O’Kane;
- f. Declaration of Kate Rueter; and,
- g. Declaration of John Buenz.

Consistent with the Court’s direction at the hearing, Aon respectfully requests leave to file these documents under seal. In light of the expedited nature of the underlying motion and the amount of information in these documents that would need to be redacted, Aon will file the entire documents under seal. Aon is willing to redact these documents on a line-by-line basis at a later date if the Court would like.

3. Aon will serve unredacted copies of all documents filed under seal on all counsel listed in the certificate of service attached to this motion.

WHEREFORE, Aon respectfully requests that this Court grant leave for Aon to file the following documents under seal:

- a. Memorandum in Support of Aon’s Emergency Motion for Order to Show Cause;
- b. Declaration of Shand S. Stephens;
- c. Declaration of Michael Rask;
- d. Declaration of Matt Anacker;
- e. Declaration of John O’Kane;
- f. Declaration of Kate Rueter; and,
- g. Declaration of John Buenz.

Dated: February 19, 2016

Respectfully submitted,

AON PLC AND AON GROUP, INC.

/s/ Shand S. Stephens

One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Shand S. Stephens, an attorney, hereby certify that on February 19, 2016, I caused the foregoing **Aon's Motion for Leave to File Under Seal** to be electronically filed with the Clerk of the Court using the CM/ECF System which will send notification of the filing to:

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*Attorneys for Defendants Michael Heffernan
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/s/ Shand S. Stephens